

S. D. Murrill & Co.

April 9, 1997

Mr. Rick Woodard
CalFed Bay-Delta Program
1416 9th Street
Room 1148
Sacramento, CA 95814

- Axns

- Project Selection

Dear Mr. Woodard,

The following comments pertain to the draft document "Priority Water Quality Subject Areas and Recommended Selection Criteria for Early Project Proposals for Ecosystem Restoration", dated March 31, 1997. These comments are submitted on behalf of myself and the members of the Water Quality Task Force of the Western Crop Protection Association.

Under the heading: Priority Water Quality Subject Areas

Item 2 reads: *Reduced*
In the Sacramento and
and Delta Island drainag

furan and Diazinon
agricultural drainage

As I stated in my presentation, I believe it is potentially a good idea to focus on carbofuran and diazinon. It's an agronomic and other program, as run by the Delta Rice Industry, demonstrates practices can have a substantial managed to reduce the chemicals by over 98%.

April 1, we
focus on specific
Chlorpyrifos, *Axns*
specific chemical,
Management
coordination with the
loss and cultural
program has
pesticide use

Keep in mind, too, that ban on carbofuran and diazinon may have unintended consequences. and diazinon may reduce water quality during the growing season. One dormant spray application would probably be replaced by two or three in-season cover sprays. Because of the timing, it could potentially increase pesticide exposure to field workers compared to a dormant spray.

We believe that a generic approach would be more appropriate for setting your priority objectives. Additionally, a generic approach would fit better with the concept of keeping the Delta ecosystem healthy by dealing with the root problem not the symptom.

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